

Mr. Joe Gowers, Project Manager
US EPA
290 Broadway, 19th Floor
NY, NY 10007

9 June 2013

RE: Ringwood Superfund Site
Comments for NRRB Review

Dear Mr. Gowers;

As a resident of Ringwood since the 1970's, I have followed the progress (or lack thereof) of the Ringwood Superfund Site. I offer the following recommendations for consideration by the EPA and National Remediation Review Board (NRRB):

1. Perform a Thorough Search for additional Hazardous Materials

Recently, additional paint sludge was found in the Upper Ringwood area. A thorough search of the entire vicinity should be conducted by an INDEPENDENT agency under EPA direction(not tied to ARCASIS, Ford, Borough of Ringwood, or other potentially responsible parties) for materials which are hazardous to humans or animals. All hazardous materials should be removed and properly and safely disposed.

2. Remove all Hazardous materials from the three Areas of Concern

All materials which are hazardous to humans and animals be removed and properly and safely disposed. Non-hazardous waste which has been dumped on these sites may remain. This includes household waste, car parts from Ford, and tailing from mining operations.

3. Groundwater Analysis

All of the groundwater testing to date has been mostly limited to a depth of 150 feet, and 500 feet for a few "deep bedrock" monitoring wells. However, the Peters mine extends to a depth of 2500 feet. There is no reported testing for contaminants in the deeper aquifer elevations, down to the full depth of Peter's mine. The statements that there is "minimal groundwater contamination" are not substantiated since benzene levels at the 150 foot depth in Cannon Mine air shaft average 30 micrograms per liter, and peak at 48, well above the permitted level of 1 microgram per liter. Ringwood is located in the North Jersey Highlands, which provides water to the Wanaque Reservoir serving over 2,000,000 residents. In addition, many other towns and cities use wells which may rely on this deep aquifer.

The EXCEL groundwater analysis report only superficially addressed Ringwood's own well fields, located a few miles from Peter's Mine. While they point out that contaminants have not yet been detected, they do not identify the time required for contaminants to move from Peter's



mine and Cannon Mine to the well area. Is the lack of detectable contaminants due to the fact that they have not reached the wells yet?

I highly doubt that the Cannon Mine air shaft is the only location where Benzene and other hazardous liquids were dumped. Eyewitness reports to the Ford dumping say that “everything” was dumped into the mines and pits.

Groundwater monitoring must continue in perpetuity. If future contaminant levels are discovered above acceptable levels, then the mine should be re-opened and contaminants removed.

4. Areas of Concern – O’Connor Landfill:

After item 1 and 2, above, are completed, this should be Closed and Capped

For all three sites the capping remedy is estimated at 7,000 truckloads, vs. 47,000 truckloads for complete removal. This creates significant dust and disturbance to the community, including an estimated 12 additional crashes with estimated two injuries. These accident injury rates are not adjusted for truck operation on local residential streets. I recommend against complete removal of all waste material. Many other landfills have been capped and turned into parks.

Cap should be designed to protect ground water and prevent erosion. It also should have sufficient soil cover to allow natural vegetation to grow and return the area to an almost-natural habitat. The Cap should be monitored and maintained in perpetuity.

5. Areas of Concern – Peter’s Mine and Cannon Mine:

I am concerned with the hazardous waste which has been thrown into the mines, and their long-term effect on the groundwater. I also recognize the difficulty and danger to workers to dig them up. I understand that some paint sludge and VOC’s have been located in Peter’s Mine at a depth of 90 feet, and they have not been removed. The EXCEL report makes no estimate of the quantity of contaminants in the mines, nor the time or effectiveness of the “bio trap” microbial decomposition.

I recommend a “Pump and Treat” method be utilized to remove as much VOC as possible, and reduce their concentrations. This can be safely done through wells drilled into the mine and shafts, without complete excavation. Discharge water should be treated to safe limits before discharge to the Wanaque Reservoir. This will reduce contamination at its source, before it spreads within the aquifer, without major excavation or worker safety hazards.

Once the liquid contaminants within the mines are reduced to safe levels, the mines themselves should be Closed and Capped.

Mine shaft caps should be structurally strong and long-lasting to prevent cave-in. About 10-20 years ago a boy was lost from a ground cave-in while walking to a relative's house. His body was never recovered due to the danger involved.

ARCADIS maps also show many other mines and pits in the area. These also should be checked for hazardous material, then Closed and Capped.

6. Environmental Justice

The residents of Upper Ringwood have suffered with this contamination for a generation. This has caused cancer, liver and organ disease, skin problems, and other medical problems on the young and old.

The New Jersey Department of Health and Senior Services analysis (Dec 2011 update) said the cancer statistics were not sufficient to prove a cancer linkage. However, there was statistical linkage in males, which they blamed on smoking, rather than hunting or other outdoor activities. They also state difficulty in obtaining medical records. They do not address the small sample size of 287 residents in the study area. This small sample size created a huge range for the 95% Confidence Interval, which invalidated their conclusions.

Throughout the entire Ringwood Borough cancer rates are high. The cause has not been identified. The Toms River drinking water contamination was proven to cause cancer in children. This tragedy should not be allowed to occur again.

The Upper Ringwood contamination has also caused an economic hardship on the residents. They are unable to obtain bank mortgages on their property, or sell their property.

I recommend that "Superfund Closure" include a buy-out offer to current residential property owners with a net payment of \$350,000, paid by Ford. (Due to state and federal income taxes, real estate fees, moving expenses, professional fees, etc. this would add to approximately \$500,000.) This payment would partially offset previous economic hardship, and allow the residents to move to a better environment for raising their families. This amount is not based on the "fair market value" of their contaminated property, but on the cost of purchasing a new home. The existing homes can then be bulldozed, and the land returned to a natural condition. (Homes at NY Love Canal were purchased and bulldozed also.)

I appreciate the opportunity to provide comments to the EPA and NRRB for their consideration.

Sincerely,

James Guinan, PE



Cc: Ringwood Superfund CAG

Exemption 6